

March 24, 2015

Marlene H. Dortch, Secretary,  
Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

**Re: CG Docket No. 02-278 and Petition For Expedited Declaratory Ruling  
Filed On Behalf Of Edison Electric Institute And American Gas Association**

Dear Secretary Dortch:

Eversource Energy (formerly Northeast Utilities) submits the following comments in strong support of the Petition for Declaratory Ruling filed by Edison Electric Institute and the American Gas Association on February 12, 2015, which would confirm that providing a telephone number to an energy utility constitutes "prior express consent" to receive non-telemarketing, informational calls at that number related to the customer's utility service.

Eversource Energy provides gas and electric service to 3.2 million customers in the New England region, including Connecticut, Massachusetts, and New Hampshire. Core to its business is providing superior customer service - service that is based upon timely, accurate, and effective communication for all events, whether they be emergent or non-emergent. It is critical (and increasingly expected) that we communicate with our customers for all utility-related transactions and events, including to: (a) warn about planned or unplanned service outages; (b) provide updates about outages or service restoration; (c) ask for confirmation of service restoration or information about the lack of service; (d) provide notification of meter work, tree trimming, or other field work; (e) verify eligibility for special rates or services, such as medical, disability, or low-income rates, programs and services; and (f) warn about payment or other problems that threaten service curtailment.

Many types of utility communications to its customers, related to the transactions and events described above, are rooted in some form of regulatory requirement, and those regulatory requirements remain in place. In recent years; however, the customer appetite for real-time, multi-modal communication has increased significantly. This, combined with a dramatic shift away from land lines to the exclusive use of wireless telephones, makes customer-offered wireless telephone numbers foundational to providing effective communication and superior customer service.

In their July 2012 report "Customer Impact Report: Utility Outage Communications Preferences", JDPower has identified 7 key aspects of outage communications, including "*Utilities should embrace new communication technologies and channels* -Customers who receive outage information through electronic sources, such as websites, email, and text messages, are more satisfied with their utility's outage performance than are those who do not receive information electronically."

In support of JD Power's research, the following case study of Eversource's (previously known as Public Service of New Hampshire) Thanksgiving Storm 2014 demonstrates Eversource's effective use of text campaigns for outage communications.

It is Eversource Energy's position that a customer supplied cellphone number provided to the utility for communication purposes constitutes prior express consent. Customers are not required to provide cellphone numbers when enrolling in service and can opt out of receiving cellphone communications at any time.

As Eversource Energy does not require express written consent for residential customers to receive either electric or gas utility services, no prior written consent should be required for customers to receive communications about their utility services.

Thank you for your consideration. We look forward to a timely response to the Declaratory Petition filed by Edison Electric Institute and the American Gas Association.

Respectfully Submitted,



Katherine A. Voght  
Customer Group Director  
Eversource Energy